

1 PHILLIP A. SILVESTRI  
Nevada Bar No. 11276  
2 GREENSPOON MARDER LLP  
3993 Howard Hughes Pkwy., Ste. 400  
3 Las Vegas, Nevada 89169  
4 Tel: (702) 978-4249  
5 Fax: (954) 333-4256  
[Phillip.Silvestri@gmlaw.com](mailto:Phillip.Silvestri@gmlaw.com)

6 MYRNA L. MAYSONET  
(Admitted Pro Hac Vice)  
7 GREENSPOON MARDER LLP  
201 East Pine St., Suite 500  
8 Orlando, Florida 32801  
9 Telephone: (407) 425-6559  
Facsimile: (407) 422-6583  
[myrna.maysonet@gmlaw.com](mailto:myrna.maysonet@gmlaw.com)

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11 *Attorneys for Defendant*

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13 UNITED STATES DISTRICT COURT  
14  
15 DISTRICT OF NEVADA

16 KEN KACHUR,  
17 Plaintiff,

18 vs.  
19 NAV-LVH, LLC dba WESTGATE LAS  
20 VEGAS RESORT & CASINO, a Nevada,  
21 Limited Liability Company,  
22  
Defendant.

Case No.: 2:16-cv-02899

STIPULATION AND REQUEST TO  
EXTEND DISPOSITIVE MOTIONS  
DEADLINE

(FIRST REQUEST)

ECF No. 37

23 COME NOW, Defendant, named above, by and through its attorneys of record, MYRNA  
24 L. MAYSONET, ESQ. and PHILLIP A. SILVESTRI, ESQ., and Plaintiff, by and through his  
counsel of record, MICHAEL P. BALABAN, ESQ., pursuant to Local Rule IA 6-1, and herein  
stipulate, agree and make joint application to extend the dispositive motions date, for a period of  
three (3) weeks, up to and including December 10, 2018. The present dispositive motions  
deadline is November 16, 2018.

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26 This is the first stipulation for an extension of time for the Defendant to file its Motion  
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1 for Summary Judgement. This stipulation is made and based upon the following factors:

2 Counsel for both Plaintiff and Defendant have several matters pending before this Court,  
3 and have been engaged in ongoing discovery and briefing. Discovery on this case only recently  
4 was completed, and certain medical records were only recently received. The additional time will  
5 allow both parties the opportunity to thoroughly review the medical records and incorporate any  
6 pertinent information into their respective dispositive motions (if any are filed).

7 Based on the foregoing, the parties request that this Court order that the time for the  
8 dispositive motions be extended three (3) weeks, up to and including, December 10, 2018.

9 Dated: November 15, 2018

10 LAW OFFICES OF MICHAEL P. BALABAN

11 /s/Michael P. Balaban  
12 Michael P. Balaban, Esq.  
13 10726 Del Rudini St.  
14 Las Vegas, NV 89141  
15 Tel: (702)586-2964  
Fax: (702)586-3023  
Attorney for Plaintiff  
16  
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Dated: November 15, 2018

GREENSPOON MARDER LLP

18 /s/Phillip A. Silvestri  
19 Myrna L. Maysonet, Esq.  
Phillip A. Silvestri, Esq.  
3993 Howard Hughes Parkway,  
Suite 400  
Las Vegas, NV 89169  
Tel: (702) 978-4249  
Fax: (954) 333-4256  
[phillip.silvestri@gmlaw.com](mailto:phillip.silvestri@gmlaw.com)  
Attorneys for Defendant  
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IT IS SO ORDERED

  
UNITED STATES DISTRICT JUDGE

11-18-18  
DATED: \_\_\_\_\_

nunc pro tunc to 11-16-18